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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors**

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF DAVID J.  
RICHARDSON IN SUPPORT OF  
MOTION TO FILE REDACTED  
DECLARATION OF JAMES  
DRINKHALL IN SUPPORT OF THE  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS' MOTION PURSUANT TO  
11 U.S.C. §§ 105(a) AND 501 AND FED.  
R. BANKR. P. 3003(c) FOR ENTRY OF  
AN ORDER EXTENDING THE BAR  
DATE**

1 DAVID J. RICHARDSON, under penalty of perjury, declares:

2 1. I am Counsel at Baker & Hostetler LLP, counsel to the Official Committee of Tort  
3 Claimants (the “TCC”) of PG&E Corporation and Pacific Gas and Electric Company (the  
4 “Debtors”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the TCC’s motion (“Redaction Motion”) for  
6 entry of an order authorizing the filing of the redacted declaration of James Drinkhall (“Drinkhall  
7 Declaration”) in support of the TCC’s Motion Pursuant to 11 U.S.C. §§ 105(A) and 501 and Fed.  
8 R. Bankr. P. 3003(C) for Entry of an Order Extending the Bar Date (“Bar Date Motion”).

9 3. After individuals’ attorneys brought facts and declarations to the TCC this month  
10 concerning various impairments and circumstances that have prevented individual claimants from  
11 filing claims prior to the claims bar date, lead trial counsel for the TCC conducted his own  
12 investigation by traveling this past weekend to the FEMA emergency housing site for Camp Fire  
13 survivors, together with investigator James Drinkhall (“Drinkhall”), where they interviewed  
14 survivors and corroborated the facts described in the victims’ Declarations.

15 4. The Drinkhall Declaration contains the names and stories of these individual fire  
16 victims that Drinkhall interviewed, but also includes certain personal information that is relevant  
17 to the nature of the impairments discussed in the Bar Date Motion, but should be protected from  
18 disclosure with connection to their identities. These individuals’ names and identities are  
19 unnecessary for the general public to understand the scope of the problem identified in the Bar Date  
20 Motion.

21 5. Contemporaneously herewith, the TCC is transmitting and unredacted copy of the  
22 Drinkhall Declaration to the Debtors.

23 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States*  
24 *of America that the foregoing is true and correct to the best of my knowledge and belief.*

25 Dated: Los Angeles  
26 October 16, 2019

/s/ David J. Richardson  
David J. Richardson